

# **SAMPLE**

## **Supporting Statement**

### **Appointment of Chaplains for the Military Services**

#### **A. JUSTIFICATION**

##### **1. Need for Information Collection**

Per 32 CFR part 65, in conjunction with 10 USC 532 and 591, professionally qualified clergy persons shall be appointed as chaplains to provide for the free exercise of religion for all members of the military services, their dependents, and other authorized persons. Since World War I, the professional qualifications of clergy have been certified by the faith group of which these clergy are members. Department of Defense recognized faith groups are required to endorse clergy as fully qualified to serve as chaplains in the armed forces. No clergy may become a chaplain without endorsement, and loss of endorsement constitutes a loss of professional status. This information collection is needed to provide certification that clergy applying for chaplaincy in the armed forces are qualified members of a faith group recognized by the Department of Defense. It also is needed to certify the number of years of professional experience for each candidate.

Department of Defense Directive 1304.19 requires that religious faith groups be officially recognized by the Department of Defense in order to endorse chaplains to the Military Services. This information collection is also needed to ensure that religious faith groups are appropriately organized and authorized by their constituencies to endorse clergy for service as chaplains in the Military Services.

##### **2. Use of Information**

There are two forms associated with this information collection. The DD Form 2088, "Certificate of Ecclesiastical Endorsement," is used whenever an ecclesiastical endorsing agency submits a clergy person as a candidate to become a chaplain. The ecclesiastical endorsing agency sends it to the Military Service which the clergy person wishes to join.

The three Military Services are required to obtain a certification of the professional qualifications of clergy applying for the chaplaincy. This certification is rendered in the form of an ecclesiastical endorsement from the clergy person's religious faith group. An ecclesiastical endorsement is an essential part of the application process for clergy to become chaplains. The DD Form 2088 is used to certify that a member of the clergy is professionally qualified to become a chaplain. It requests information about name, address, professional experience, and previous military experience to be used in determining grade, date of rank, and eligibility for promotion for appointees to the chaplaincies of the armed forces. Both the military and the religious faith groups insist on ensuring that only professionally qualified clergy serve as chaplains. Without this formal process, the chaplaincy would cease to exist as a professional corps.

The DD Form 2741, "Department of Defense Ecclesiastical Endorsing Organization Verification/Reverification Information," is used by religious faith groups seeking DoD recognition as ecclesiastical endorsing organizations for supplying chaplains to the Military Services. The information from the DD Form 2742 is collected whenever a religious faith group initially seeks recognition by the Department of Defense as an ecclesiastical endorsing agency; it is reverified every 3 years thereafter. The form is sent by the religious faith group to the Armed Forces Chaplains Board (AFCB).

Each religious faith group is required to certify that it is authorized by its membership to act as the sole agency for the purpose of certifying and endorsing clergy to serve as military chaplains. After initial certification, these organizations are required to reverify this information every 3 years. Information from the DD Form 2741 is used by the AFCB to determine whether a religious faith group should become (or remain) an ecclesiastical endorsing agency, able to endorse clergy for service as chaplains. The AFCB regularly supplies the military Chaplain Services with a list of recognized ecclesiastical endorsing agencies. The list is used in the chaplain recruitment/accesion process to validate that candidates for the chaplaincy are endorsed by a group recognized by the Department of Defense.

The DD Form 2741, "Ecclesiastical Endorsing Organization Verification/ Reverification," is used to request basic demographic information about religious denominations seeking to supply clergy persons to the Military Services to serve as chaplains. It requests the name of an official authorized to represent the organization to the Military Services, and it requires the organization to certify that it is authorized by its membership to act as the sole agency for the purpose of certifying and endorsing clergy to serve as military chaplains.

The information collected from the DD Form 2088 has been used over the past several years by the three Military Services to ensure that those clergy who applied to become chaplains were professionally qualified and appropriately endorsed by their respective religious faith groups.

### 3. Improved Information Technology

Because the Chaplain Services and the ecclesiastical endorsing agencies have not previously had widespread access to advanced information technologies, they have not been able to utilize electronic means of information collection. However, now that advanced technologies are available and widespread, the Chaplain Services are prepared to begin transmitting the information using FormFlow, beginning in October, 1996. Over the next 3 years, we estimate an annual average of 10% of the respondents will use FormFlow. Since we are not requiring the ecclesiastical endorsing agencies to possess the computers and software, we estimate that it will take several years to phase in a completely electronic system. Many, but not all, of the ecclesiastical endorsing agencies plan to obtain the software as part of their customary business and for reasons other than to provide information or to keep records for the government. Until all the civilian agencies obtain the necessary software we will need to continue providing printed forms. Total conversion to electronic submissions will ultimately reduce response time and mailing costs.

### 4. Efforts to Identify Duplication

No other government agency is responsible for this program. The three military chiefs of chaplains do not have any forms or information collection which duplicate the information collected. There is no other way to collect this information.

### 5. Methods Used to Minimize Burden on Small Entities

Collection of this information does not have a significant impact on small businesses.

### 6. Consequences of Not Collecting the Information

This information is collected only on occasion. If collections were stopped, the ability of the Department of Defense to establish eligibility for service as a military chaplain would cease to exist.

### 7. Special Circumstances

There are no special circumstances that require this collection to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5(d)(2).

#### 8. Agency 60-Day Federal Register Notice and Consultations Outside of the Agency

This information collection was published in the Federal Register on January 26, 1996, pages 2494-2495. Consultation with the ecclesiastical endorsing agents regarding this information collection is done each December at the annual meeting of the National Conference on Ministry to the Armed Forces (NCMAF). At the 1995 conference, the ecclesiastical endorsing agencies attested that they are extremely pleased with the use of the DD Form 2088 and the entire endorsing process.

The DD Form 2741 was created by the Personnel Advisory Group of the Armed Forces Chaplains Board (AFCB), in conjunction with NCMAF, when both groups recognized that DOD Directive 1304.19 requires an official process of verification/reverification of ecclesiastical endorsing agencies, and that the Department of Defense does not presently have a form for the requisite information collection.

#### 9. Payments to Respondents

No payment or gift will be provided to the respondents.

#### 10. Assurance of Confidentiality

This information becomes a part of the individual's military personnel file and is maintained by each Service and protected under the Privacy Act of 1974.

#### 11. Sensitive Questions

There are no sensitive questions asked in this information collection.

#### 12. Estimates of Response Burden and Annual Cost to the Respondent

##### (a) Respondent Burden:

##### (1) DD 2088

Response per respondent:	1
Number of respondents:	650
Hours per Response:	1
Annual Burden	650 hrs.

##### (2) DD 2741

Response per respondent:	1 every three years
Number of responses:	67 (average over three years: 200 respondents divided by 3 years)

Hours per Response:	3
Annual Burden:	201 hrs.

##### Estimated average annual burden:

# Respondents	717
# Responses Per Respondent	1
Total Annual Responses	717
Avg. Hours Per Response:	1.187 (Total annual hrs 851 divided by total annual responses 717 equals average hrs per response 1.187)

Total annual burden: 851 hrs. (Total annual responses 717 x average hrs. per response 1.187 equals annual burden 851)

(b) Annual Cost to Respondent:

Hourly pay for ecclesiastical endorsing agents: \$25.00

(1) DD Form 2088: 650 forms @ one hour per form = \$16,250.00

(2) (2) DD Form 2741: 67 forms @ three hours per form = \$5,025.00

Total annual cost to respondent: \$21,275.00

13. Estimates of Cost Burden to the Respondent for Collection of Information

Estimate of the Total Annual Cost Burden Per Form

(a) Total capital and start-up cost component: There are no start-up costs associated with this information collection. Respondents maintain the information for reasons other than to provide information or to keep records for the government. Although we are not requiring the civilian agencies to purchase software packages, at the most recent meeting of the National Conference on Ministry to the Armed Forces (NCMAF) about 50 ecclesiastical endorsers noted that they have or are soon planning to obtain FormFlow. We will be mailing diskettes of our forms to those agencies that have the software.

(b) Total average annual operational and maintenance cost

(1) Mailing (total forms 717)

DD Form 2088: 650 forms at \$ .32 per form = \$208.00

DD Form 2741: 67 forms at \$ .64 per form = \$ 42.88

(2) DD 2741 - Supporting documentation

7 pages at \$ .03 per page = \$ .21 X 67 applications = \$ 14.07

TOTAL ANNUAL O&M COST: \$264.95

14. Estimated Annualized Cost to the Federal Government

(a) Printing forms (OSD Printing Office) \$ 50.00

Diskettes (avg. 7 boxes annually @ \$5.00 box) (10%) \$ 35.00

(b) Accessioning officers reviewing and processing the forms - hourly pay \$25.00 x 10 minutes = \$4.16 per form

717 forms @ \$4.16 per forms \$2,982.72

(c) Mailing

645 forms @ 32 cents per form \$207.04

72 diskettes @ 50 cents per diskette \$ 35.00

TOTAL ANNUAL COST: \$3,309.76

15. Changes in Burden

Program change is due to reinstatement, with change, of an expired information collection.

16. Publication Plans/Time Schedule

The results for collection of this information will not be published.

17. Approval Not to Display Expiration Date

Approval not to display an expiration date is not being sought.

18. Exceptions to the Certification Statement

No exceptions to the certification statement are being sought.

**B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS**

This collection will not employ statistical methods.

*[ For collections employing statistical methods, as designated in Block (17) of OMB Form 83-I, Section (B) must be addressed. ]*